

KEVIN V. RYAN (CSBN 118321)  
United States Attorney

MARK KROTISKI (CSBN 138549)  
Chief, Criminal Division

SUSAN R. JERICH (CSBN 188462)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102  
Telephone: (415) 436-7158  
Facsimile: (415) 436-7234  
Email: susan.jerich@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
BRIAN WOODSON,  
Defendant.

No.: CR 06-330 SI

PARTIES' STIPULATION AND  
PROPOSED ORDER EXCLUDING  
TIME UNDER SPEEDY TRIAL ACT

The parties stipulate and agree, and the Court finds and holds, as follows:

1. The parties appeared before this Court on July 7, 2006 for status.

2. It was determined that additional time was required in order to provide forensic discovery to the defendant. Counsel for the defendant indicated that he required additional time to receive and review the forensic discovery in the matter.

3. The parties requested that the matter be continued until July 21, 2006 for change of plea or trial setting.

4. The defendant requested an exclusion of time based upon effective preparation of counsel. The request was granted by the Court.

5. The parties move that the time period from July 7, 2006 through July 21, 2006 be excluded

1 from the calculation of time under the Speedy Trial Act due to effective preparation of counsel.

2 6. In light of the foregoing facts, the failure to grant the requested exclusion  
3 would unreasonably deny counsel for the defense the reasonable time necessary for effective  
4 preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(A),  
5 (B)(iv). The ends of justice would be served by the Court excluding the proposed time period.  
6 These ends outweigh the best interest of the public and the defendant in a speedy trial. See id. §  
7 3161(h)(8)(A).

8 7. For the reasons stated, the time period from July 7, 2006 through July 21, 2006, shall be  
9 excluded from the calculation of time under the Speedy Trial Act.

10 SO STIPULATED.

11 DATED: 7/07/06

Respectfully Submitted,

12  
13 /s/  
14 SUSAN REED JERICH  
15 Assistant United States Attorney

16 DATED: 7/10/06

17 /s/  
18 GEOFFREY HANSEN  
19 Counsel for Defendant

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED:

22   
23 HON. SUSAN Y. ILLSTON  
24 Judge, United States District Court  
25  
26  
27  
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Parties' Stipulation and Proposed Order in the case of United States v. Brian Woodson No. CR 06-330 SI , was served today as follows:

Hand Delivery  
Geoffrey Hansen, Esq.  
Federal Public Defender's Office

I certify under penalty of perjury that the foregoing is true and correct.

Executed on July 10, 2006 at San Francisco, California.

\_\_\_\_\_  
/s/  
Rawaty Yim  
United States Attorney's Office